



MEMORANDUM

To: CMAP Transportation Committee

From: CMAP staff

Date: September 2015

Re: Proposed threshold for projects to include in the next long-range plan

The next long-range plan provides an opportunity to improve the definition and scope of transportation projects considered in the plan to best incorporate those that have regional impacts. CMAP currently defines “major capital projects” as capacity additions to the expressway system or comparable changes to the transit system, generally meaning a rail extension. However, projects that fall below the level of new capacity on expressways and rail lines clearly have important impacts on the region, and cumulatively they may well have a larger effect than those of the currently defined major capital projects. Specific investments are needed to achieve the plan indicators; to show progress on them, a larger set of project types would be helpful. Expanding the types of projects included in the region’s long-range plan can help ensure that policy makers have ready access to the best information possible to make cooperative, transparent, and prioritized investment decisions.

Thus, the Transportation Committee (TC) began a [discussion](#) at its July 2015 meeting on alternative thresholds for projects to include in the next long-range plan. Staff prepared five options for discussion. Most of the conversation centered on the first three options -- thresholds based on cost, work type, and facility type -- with several suggestions for a blend of different types of thresholds for different types of projects. There was less interest in the fourth and fifth options, which involved definitions based on anticipated effects or status under the National Environmental Policy Act.

This memo distills the conversation from the July TC meeting as well as conversations with partner agencies to provide a potential threshold for projects to include in the plan for further discussion. It also follows up on members’ requests for additional information on the kinds of projects other MPOs include in their plans.

Types of Projects Included in Long-Range Plans at other MPOs

CMAP staff reviewed a small number of peer MPOs to see how they treat projects within the context of a long-range regional transportation plan (see the table in Appendix A for more

detail). Like GO TO 2040, these MPOs describe preferred transportation strategies and support for high-level policies in their transportation plans. But the case study group goes beyond GO TO 2040 by listing a far larger number of transportation projects. To illustrate, the MPOs in the [Atlanta](#), [San Francisco Bay](#), [Seattle](#), [New York](#), and [Southern California](#) areas each include hundreds of projects in their long-range transportation plans.

Thus, other large MPOs¹ do not confine their long-range plan recommendations as narrowly as GO TO 2040's major capital projects. For instance, the Seattle area's definition of [regional capacity projects](#) includes a broad set of project work types – additional lanes, new street realignment, new interchanges, grade separations, separated bike/pedestrian paths, new transit stations, among others – as long as they are on a pre-defined regionally significant transportation network. The [Washington, DC MPO](#) includes in its plan any project deemed regionally significant for air quality purposes.² The [Dallas MPO's](#) plan includes rail projects as well as capacity additions to “regionally significant arterials.” The [Philadelphia MPO](#) includes many highway and transit rehabilitation projects in addition to most new capacity.

Potential Threshold for Projects to Include in the Regional Plan

The current definition of major capital projects at CMAP only includes expressways and rail projects, which is a limited view of the region's transportation system. Some implementers have said that the current definition leaves their projects out of the regional plan and implies that they are less significant because their priorities are not on the expressway system or on fixed guideways. The narrowness of the definition does not fully capture the contributions and priorities of all of the region's transportation implementers. Likewise, since they are so few and so large, the geographic distribution of major capital projects at the current threshold tends to be “lumpy” and can present a challenge in demonstrating that the entire region benefits from them.

In its [2014 MPO certification review](#), the U.S. DOT recommended that the next plan include some non-capacity improvements and in general base the threshold of projects to include on their impact rather than the scope. Lastly, the CMAP Board's [guidance](#) suggests a larger set of projects should be considered in the plan. As these are general policy directives, discussions at the working committee level (that is, at the Transportation Committee) are needed to provide detail on what those projects should be.

Given the discussion above, a proposed threshold for projects to itemize in the next regional plan could be those that:

¹ TC members also requested additional information about how small MPOs treat capital projects in their plans. However, they are not peers for a complex region like northeastern Illinois. They typically have few competing high-dollar projects, a small number of implementers and funding sources, few transit investments, and more modest transportation challenges in general.

² For TIP and air quality conformity purposes, federal rules define a regionally significant project as one on a “facility which serves regional transportation needs,” which “at a minimum... includes all principal arterial highways and all fixed guideway transit facilities that offer a significant alternative to regional highway travel” (23 CFR 450.104).

1. Cost at least \$50 million (or some other value) and (a) change capacity on the National Highway System (NHS³) or are new expressways or principal arterials, or (b) change capacity on transit services with some separate rights-of-way or shared right-of-way where transit has priority over other traffic; or
2. Cost at least \$250 million (or some other value), regardless of the facility type or work type.

For highways, the proposed thresholds would consider principal arterials as well as the expressways the plan already considers. This would help the next regional plan be more effective at addressing congestion and other highway needs. For example, principal arterials carry 25 percent of the vehicle miles traveled in the region (expressways, which are already addressed under the current major capital project definition, carry 32 percent) and have almost twice as much total congestion delay as the expressways. Upcoming MAP-21 rules will require setting certain performance targets for the NHS, suggesting a need to incorporate projects that help achieve these targets. As the NHS is the focus of federal highway performance management, it can be taken that the NHS is also a regionally significant network.

On the transit side, the definition above is meant to capture projects with regional impacts similar to rail service expansion in terms of capacity and quality of service – including bus rapid transit (BRT) projects. While the cost of an individual arterial rapid transit project typically would be less than \$50 million, these projects could be considered as a program. Any of these bundled projects seeking to move into the Engineering phase of the FTA Capital Investment Grant program can be specifically itemized to meet the recommendations of the certification review. Lastly, while bicycle projects occasionally meet the \$50 million threshold, bicycle investment needs should be discussed at the program level in a regional plan rather than being individually listed.

Candidate projects would be compared to the cost thresholds based on current dollars (any conversion to year-of-expenditure cost would be carried out by CMAP when necessary to meet federal rules). The entire project cost, not just the cost of the capacity, would be used to determine whether the project is regionally significant. Projects that change capacity are those with **non-exempt TIP work types**, in other words those that are already considered under federal rules to demonstrate air quality conformity. The non-capacity projects that the certification review encouraged the plan to contain would be captured in the second threshold of \$250 million.

Anticipated Numbers and Types of Projects that Meet the Thresholds

The proposed cost thresholds place practical limits on the total number of projects to be considered in the regional plan. While any number of projects could be proposed as part of the upcoming planning process, the TIP database provides some sense of the universe of projects that meet the proposed threshold. Considering both projects that are already awarded from the

³ The NHS includes the expressway system and other principal arterials as well as limited mileage of intermodal connectors.

database as well as those that are not funded (“illustrative projects”) provides a roughly ten-year window of projects proposed in the region. Of these, 117 projects meet the proposed thresholds. In comparison, the GO TO 2040 update planning process considered a universe of 56 projects and recommended 17 of them, plus the CREATE program as a whole. Therefore, the universe of projects would at least double for the next plan according to the proposed thresholds.

It is not typical for other MPOs to use a cost threshold. The San Francisco Bay Area’s MPO informally considers all projects totaling more than \$50 million as regionally significant, but it is the only one in the peer group CMAP studied. While selecting a cost threshold is essentially a judgment call, it can be compared to other programs. As one comparison, the TIGER grant program is for projects that applicants judge to be regionally or nationally significant; in the 2015 round the cost threshold was \$12.5 million. Over half of the projects submitted from the region had total costs below \$50 million, demonstrating that implementing agencies consider lower-cost projects to have regional impacts.

Conclusion

The proposed thresholds for projects to include in the next plan represent a starting point for the TC’s further discussions. These thresholds would be relatively simple to implement, would allow a reasonably sized universe of projects to be considered in the long-range plan, would meet CMAP Board direction in increasing the next plan’s specificity with regard to transportation projects, and would address the recommendation in the U.S. DOT’s certification review. Most importantly, the proposed threshold will still allow for the plan’s identification of the most critical projects in the region and focus resources on their accomplishment.

From a workload perspective, it is not an excessive administrative challenge for CMAP to handle a somewhat larger number of projects. The TC should be aware that the definition may require more plan amendments than the current GO TO 2040 definition, but the plan amendment process at CMAP can be streamlined. Furthermore, the financial plan should be developed so that amending the long-range plan does not necessarily require removing or reducing the scope of another project to maintain fiscal constraint. At the same time, the plan amendment process should not become purely administrative in nature – only special or unforeseen circumstances should require amending the plan outside of the four-year update cycle. Note finally that specifically listing a project in the long-range plan or calling it regionally significant does not trigger any other federal or state requirements for implementers except requiring that the project be included in the conformity determination for the region without having to have funding identified within the TIP.

Following the discussion at the September TC meeting, staff plans to address any recommendations that result and provide an update to the CMAP Board and MPO Policy Committee at their joint meeting in October.

Action requested: Discussion

Appendix A: Peer MPO review

Peer MPO / Population	Projects itemized in the long-range transportation plan
Atlanta Regional Commission, Atlanta, 4.2 million	No cost threshold, but plan project list has hundreds of projects, ranging from bike/ped to bridge replacement to transit projects to intersection improvements.
Metropolitan Transportation Commission, San Francisco Bay Area, 7 m	\$50 million threshold for being itemized in plan; plan itemizes highway projects, grade separations, transit stations, etc.
Puget Sound Regional Council, Seattle, 3.8 m	No cost threshold, but all capacity additions on principal arterials and above must be listed on Regional Capacity List; also grade separations, interchanges, larger transit parking lots, etc.
Delaware Valley Regional Planning Commission, Philadelphia, 5.6 m	No cost threshold. Plan refers to Major Regional Projects and evaluates them separately but does not define them. Examination of list shows costs can be <\$10 million but does not include projects “less than a few lane-miles in length on minor arterial and collector roads.” Includes many rehabilitation projects.
Met Council, Twin Cities, 3 m	No cost threshold, but specific projects down to minor arterial expansions and arterial rapid transit are listed in long-range plan.
North Central Texas Council of Governments, Dallas, 6.8 m	No cost threshold, but specifically lists rail projects as well as capacity additions to “regionally significant arterials” (generally other principal arterials).
Metropolitan Washington Council of Governments, Washington DC, 5.2 m	No cost threshold. Plan includes “any project deemed regionally significant for air quality purposes. This typically means any project that adds or removes highway or transit capacity. Agencies may also submit any other projects they wish to highlight at the regional level.”
Southern California Association of Governments, Los Angeles, 18 m	No cost threshold. The TIP is incorporated into the plan as constrained, and the plan also includes all fiscally constrained projects that extend beyond the six years of the TIP.
San Diego Association of Governments, San Diego, 3.2 m	No cost threshold. Plan includes a capital improvements category with BRT, managed lanes, etc. Plan includes arterial improvements and expansions but without cost data.
New York Metropolitan Transportation Council, New York, 12.4 m	No cost threshold. Constrained and unconstrained highway and transit projects are listed by county to <\$5 million, including safety projects, signage, bicycle and pedestrian projects, etc.